

UNITED STATES DISTRICT COURT

FILED
RICHARD W. NAGEL
CLERK OF COURT

for the
 Southern District of Ohio



2/24/22

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address)
 Priority Mail Express Tracking Number
 EI078820312US
 Postmarked February 7, 2022

Case No. 3:22MJ075

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

Priority Mail Express Package EI078820312US addressed to Deandrea Robinson, 1908 Warder St, Springfield, OH 45503, with a return address of Linda Holmes, 617 W Rivera Dr, Tempe, AZ 85282.
 located in the Southern District of Ohio, there is now concealed (*identify the person or describe the property to be seized*):

Controlled Substances, materials and documents reflecting the possible distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

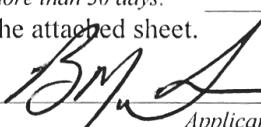
The search is related to a violation of:

Code Section
 21 USC 841(a)(1)
 21 USC 846
 21 USC 843(b)

Offense Description
 Distribution and possession with intent to distribute a controlled substance.
 Conspiracy to distribute/possess with intent to distribute a controlled substance
 Use of a communication facility to commit a felony

The application is based on these facts:
 SEE ATTACHED AFFIDAVIT

- Continued on the attached sheet.
- Delayed notice of _____ days (*give exact ending date if more than 30 days*: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Brad M. Dorman, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 Telephone _____ (*specify reliable electronic means*).

Date: 2/24/22

City and state: Dayton, OH



Judge's signature

United States Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN THE MATTER OF THE SEARCH OF:
PRIORITY MAIL EXPRESS
PACKAGE TRACKING NUMBER
EI078820312US

Case No. 3:22MJ075
Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, **Brad M. Dorman**, being first duly sworn, hereby depose and state as follows:

1. I am a United States Postal Inspector and have been since August 2017. I am presently assigned to the Cincinnati Field Office of the United States Postal Inspection Service, Pittsburgh Division, with investigative responsibility for southeast Indiana and southern Ohio. Part of my responsibility involves investigating the illicit use of the United States Mails in the transportation of narcotics, other dangerous controlled substances, and financial proceeds from, or instrumentalities used in, the sale of such narcotics and controlled substances (hereinafter, "Drugs and/or Proceeds").
2. Based on my prior training and experience as a United States Postal Inspector, I have become aware that drug traffickers frequently use United States Priority Mail Express (overnight) or Priority Mail (2-3-day) to transport Drugs and/or Proceeds. Additionally, as a result of prior investigations, law enforcement training, and successful controlled-substance prosecutions involving the use of the United States Mail, I have learned of certain common characteristics and/or circumstances that indicate that a particular package may contain Drugs and/or Proceeds. These circumstances and/or characteristics include, but are not necessarily limited to, the following: the mailer uses different post offices on the same day to send packages, the return address is false or non-existent, the addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, the labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanate from the package, and the listed address is located in an area of known or suspected drug activity.

3. On February 8, 2022, the U.S. Postal Inspection Service intercepted a package (hereinafter “the Package”) at the Dayton, Ohio Processing and Distribution Center (PDC). The Package is a USPS Priority Mail Express Padded Flat Rate Envelope, bearing tracking number EI078820312US, mailed from Post Office 85284, postmarked February 7, 2022, with the following address information:

Sender: Linda Holmes
617 W Rivera Dr
Tempe, AZ 85282

Addressee: Deandrea Robinson
1908 Warder St
Springfield, OH 45503

Through training and experience as a Postal Inspector, I know that the Phoenix, Arizona area has been long known to be a drug source location.

4. I performed a check in the CLEAR database for the addressee’s information on the Package of “Deandrea Robinson, 1908 Warder St, Springfield, OH 45503.” CLEAR is a law enforcement database that is used as a tool for investigators to identify person/business and address information. According to CLEAR, there is no “Deandrea Robinson” associated with 1908 Warder St, Springfield, OH 45503

5. I also performed a check in CLEAR for the sender’s information listed on the Package of “Linda Holmes, 617 W Rivera Dr, Tempe, AZ 85282.” According to CLEAR, there is no “Linda Holmes” associated with 617 W Rivera Dr, Tempe, AZ 85282.

6. On February 10, 2022, at the request of the U.S. Postal Inspection Service, Detective Anthony Hutson of the Montgomery County Sheriff’s Office conducted a narcotics-detection canine “free air” check of the outside of the Package. An Inspector was present during said check. Prior to conducting the “free air” check, the Package was placed in a room with multiple similar and like packages. As set forth in the attached affidavit of Detective Hutson, “Hank” alerted positively for the presence or odor of a narcotic or other controlled substance exuding from the Package. “Hank” is a properly trained and certified narcotics-detection canine.

7. Based on my prior law enforcement training and experience as a United States Postal Inspector, the Package's address information, including (i) no association between the sender and return address, (ii) no association between the addressee and recipient address, and (iii) the positive alert of the narcotics-detection canine are all indicative of and consistent with Drugs and/or Proceeds being present in the Package.

Therefore, a search warrant to open the Package is requested.

Further, your affiant sayeth naught.

Respectfully submitted,

Brad M. Dorman

U.S. Postal Inspector

United States Postal Inspection Service

24th

Subscribed and sworn to and before me this _____ day of Feb, 2022.

HONORABLE SHARON L. OVINGTON
UNITED STATES MAGISTRATE JUDGE





UNITED STATES POSTAL INSPECTION SERVICE
PITTSBURGH DIVISION

OFFICER AFFIDAVIT

I, Detective ANTHONY HUTSON, am and have been employed by the MONTGOMERY COUNTY SHERIFF'S OFFICE since 1998. Among other duties, I am currently the assigned handler of narcotics detection canine "HANK" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

Cocaine, Methamphetamine, Heroin and their derivatives

On 02/10/2021, at the request of Postal Inspector ROSSITER, I responded to the DAYTON P&DC, where "HANK" did alert to and indicate upon: [describe item]

USPS Priority Mail Express Tracking # E1078820312US

TO: Deandrea Robinson
1908 Wader St
Springfield, OH 45503

FROM: Linda Holmes
617 W Rivera Dr
Tempe, AZ 85282

Which, based upon my training and experience and that of "HANK", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

D. Hutson 2/10/22
(Signature, Badge #, and Date)

EPA 2/10/22
(Witness/Date)